

AO 91 (Rev. 02/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the  
Southern District of Texas

United States of America )

v. )

AKA: Jose Jesus MARTINEZ-Rodriguez )

COB: Mexico )

YOB: 1999 )

Defendant

Case No. 7:18mj 1977

TRUE NAME: JUAN JESUS MARTINEZ-RODRIGUEZ

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 09/20/2018 in the county of Brooks in the Southern District ofTexas, the defendant violated 8 U. S. C. § 1324

, an offense described as follows:

Knowing or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law, transports, or moves or attempts to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law from one location in Falfurrias, Texas, to another location in Falfurrias, Texas.

This criminal complaint is based on these facts:

I declare under penalty of perjury that the statements in this complaint are true and correct. Executed on September 22, 2018.

See Attachment "A"

☒ Continued on the attached sheet.

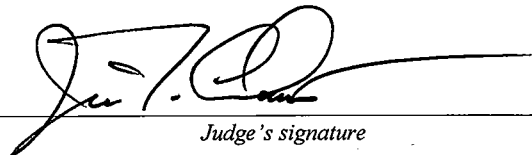
/s/ Ali Muhiuddin

Complainant's signature

Ali Muhiuddin, HSI Special Agent

Printed name and title

Sworn to and executed by reliable electronic means,  
per Fed. R. Cr. P. 4.1, & probable cause  
found by:  
Date: 09/22/2018 - 11:54 a.m.



Judge's signature

City and state: McAllen, Texas

Juan F. Alanis, U.S. Magistrate Judge

Printed name and title

ATTACHMENT A

On September 20, 2018, at approximately 2315 hours, the United States Border Patrol (BP) stopped a vehicle (2008 Chrysler Pacifica) near Jim Wells County Road 400, north of Falfurrias, Texas. Shortly before the stop, BP aerial support had observed the vehicle load up a group of suspected undocumented aliens (UDA)s within or about the same area. At the onset of the stop, the driver of the vehicle, later identified as Juan MARTINEZ-Rodriguez and nine UDAs absconded. BP subsequently arrested and detained all individuals.

MARTINEZ-Rodriguez, a Mexican National, in a post Miranda interview with BP admitted he was the brush guide and driver responsible for transporting the group of nine UDAs around the Falfurrias, TX BP checkpoint. Furthermore, MARTINEZ-Rodriguez admitted a tenth member of the group of UDAs, a female was left in the brush at approximately 1600 hours on September 20, 2018, due to her exhaustion and inability to walk. MARTINEZ-Rodriguez recounted the route he walked based on memory and GPS coordinates from his cellular phone.

On September 21, 2018, at approximately 0515 hours, BP located a deceased female UDA south of Falfurrias, TX, near the Brooks County Safety Rest Area. The location was consistent with information provided by MARTINEZ-Rodriguez.

Emperatriz Avalos-Molina, an El Salvadorian national, during a post Miranda interview positively identified MARTINEZ-Rodriguez as the brush guide and driver responsible for transporting her around the Falfurrias BP checkpoint via foot and vehicle on September 20, 2018. Furthermore, she admitted to traveling with another female UDA who was left behind in the brush on MARTINEZ-Rodriguez's orders, due to the female's exhaustion and inability to walk.

Tomas Montiel-Hernandez, a Mexican national, during a post Miranda interview positively identified MARTINEZ-Rodriguez as the brush guide and driver responsible for transporting him around the Falfurrias BP checkpoint via foot and vehicle on September 20, 2018. Furthermore, he admitted to traveling with another female UDA who was left behind in the brush on MARTINEZ-Rodriguez's orders, due to the female's exhaustion and inability to walk.

Nilson Trujillo-Palma, a Guatemalan national, during a post Miranda interview positively identified MARTINEZ-Rodriguez as the brush guide and driver responsible for transporting him around the Falfurrias BP checkpoint via foot and vehicle on September 20, 2018. Furthermore, he admitted to traveling with another female UDA who was left behind in the brush on MARTINEZ-Rodriguez's orders, due to the female's exhaustion and inability to walk.